

LAW OFFICE OF REBECCA FEIGELSON  
Rebecca Feigelson (SBN 282940)  
345 Franklin Street, Law Chambers Building  
San Francisco, CA 94102  
Tel: 415-562-5541  
Fax: 415- 241-7340  
Email: [feigelsonlaw@gmail.com](mailto:feigelsonlaw@gmail.com)  
Attorney for Defendant

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
LOURDES CURCIO,  
  
Defendant.

Case No.: CR 15-00133 MMC  
STIPULATION AND ~~PROPOSED~~ ORDER  
TO CONTINUE TO AUGUST 5, 2015

The defendant, LOURDES CURCIO, represented by Rebecca Feigelson, and the government, represented by Daniel Talbert, Special Assistant United States Attorney, stipulate to continue the defendant's status hearing, currently set for July 15, 2015, until August 5, 2015. Counsel for the defendant and the government are attempting to negotiate a resolution of this case. The parties anticipate that the August 5, 2015 date can be set on calendar for a change of plea.

The parties further stipulate that, based on the need for counsel to review the proposed resolution of this case, the time between July 15, 2015, and August 5, 2015, be excluded from the Speedy Trial Clock for effective preparation of counsel pursuant to 18 U.S.C. § 3161(h)(7)(A) and (b)(iv).

Dated: July 8, 2015

/s Rebecca Feigelson

REBECCA FEIGELSON

Attorney for Defendant

1 Dated: July 8, 2015

2 MELINDA HAAG

3 United States Attorney

4  
5 s/ Rebecca Feigelson for Daniel P. Talbert

6 DANIEL P. TALBERT

7 Special Assistant United States Attorney

8 //

9 //

10 //

11 //

12 //

13 //

14 //

15 //

16 //

17 //

18 //

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26 //

27 //

28

~~PROPOSED~~ ORDER

Based upon the representations of counsels and for good cause shown, the Court orders that the status hearing for the defendant shall be re-set for August 5, 2015, at 2:30 pm, for change of plea. Based upon the representation of counsel and for good cause shown, the Court finds that failing to exclude the time between July 15, 2015, and August 5, 2015, would unreasonably deny counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time between July 15, 2015, and August 5, 2015, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, IT IS HEREBY ORDERED that the time between July 15, 2015, and August 5, 2015, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

DATED: July 9, 2015 forHON. MAXINE M. CHESNEY  
United States District Judge